



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
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NEW YORK, NY 10007-1866

SEP - 6 2006

Via fax and mail

Mr. Glen Savary, P.E.
Case Manager
Bureau of Federal Case Management
New Jersey Department of Environmental Protection
401 East State Street
Trenton, NJ 08625

Re: Review of the 2nd Quarterly Monitoring Report for 2006, Dated August 2006; the 1st Quarterly Monitoring Report for 2006, Dated May 2006, and, the 4th Quarterly Monitoring Report for 2005, Dated February 2006, L.E. Carpenter Site, Wharton, Morris County, NJ.

Dear Mr. Savary:

As requested, the U.S. Environmental Protection Agency (EPA) has reviewed the above referenced reports, prepared by RMT on behalf of L.E. Carpenter & Company, for the L.E. Carpenter Superfund Site, and is pleased to provide the following comments for your consideration.

First, it is noted that the new monitoring well, designated as MW-19-12, recently installed in the MW-19 former underground storage area (UST) was ND for the contaminants of concern. While it is clearly noted to be the down most gradient well in this area, as outlined in EPA's February 10, 2006 letter addressed to Anthony Cinque, there remain several important continuing concerns regarding the MW-19 area. In that letter, EPA recommended a more aggressive remedial approach be initiated to address the observed the then recent significant increases in contaminant concentrations. This was because monitoring results had indicated significant groundwater contamination remains and has not been diminishing as had been reported in the past. The same concerns and comments were similarly expressed in a subsequent letter the NJDEP addressed to the PRP's consultant in December 2005. In response, on February 11, 2006, RMT submitted a Quarterly Monitoring Report for the 4th Quarter 2005, dated February 2006. This report discussed the potential of vapor intrusion and MW-19 area. The report also stated that the question of whether active remediation should be considered for the MW-19 area will not be addressed until completion of a soil vapor intrusion evaluation and a verified reproducible down-gradient clean zone has been established in greater detail. While this was not the preferred

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approach, it is EPA's understanding that as these goals have now been accomplished, and that the NJDEP is similarly considering that a more aggressive remedial approach is warranted in the MW-19 area. It should also be reiterated that as this is a very small area, therefore a more aggressive remedial approach such as dual phase extraction (DPE), can be relatively inexpensive and easy to implement, and will much more quickly mitigate the future possibility for vapor intrusion across Ross Street, than will MNA, as is presently proposed by the PRP's consultant.

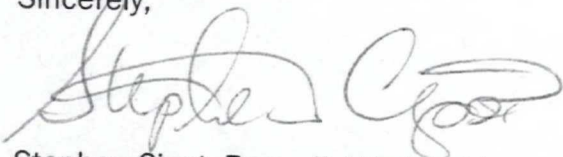
The EPA continues to strongly believe that the utilization of a relatively simple technology as DPE, or other technology which could be quickly evaluated by the PRP and presented in a new proposal, would save considerable time and effort, be overall more efficient, and address possible concerns for human health and the environment that may otherwise arise in the future. It should be noted that the USTs in the MW-19 area were removed 15 years ago, and groundwater monitoring results spanning this time continue to indicate that hot spot treatment is warranted, as significant impacts to groundwater are ongoing. Therefore, based on the above, EPA has reviewed the above reports and continues to recommend that a more aggressive remedial approach be pursued in the MW-19 area.

Regarding the surface water sampling results, reported in the 2nd Quarterly Monitoring Report for 2006, in both the Rockaway River and former Air Products Drainage Ditch, have diminished greatly. These areas should continue to be monitored on a regular basis, with a subsequent report submitted on a timely basis, to the NJDEP and EPA.

Regarding the installation of the post remediation monitoring well network, it is recognized that there has been a delay in well installation because not all approvals have been granted by the NJDEP. Maybe these can be expedited, as it has been over a year since this area was remediated, of LNAPL/free product, lead, PCB soils and other wastes, and groundwater results are lacking in the remediated areas. Additionally, the recommended slight adjustment in the locations for of the proposed new wetland monitoring wells is acceptable to the EPA, as recommended and outlined in the related discussion in the 2nd Quarterly Monitoring Report for 2006.

Thank you for the opportunity to review the above reports. If you have any questions or comments on the above, please do not hesitate to contact me at (212) 637-4411.

Sincerely,

A handwritten signature in dark ink, appearing to read "Stephen Cipot", written in a cursive style.

Stephen Cipot, Remedial Project Manager
New Jersey Remediation Branch